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August 8, 2024

Hon. Nancy E. Brasel United States District Court Judge United States District Court for the District of Minnesota Minneapolis Courthouse 300 South Fourth Street Minneapolis, MN 55415

Re: Loe, et al. v. Jett, et al. No. 0:2023-cv-01527 Joint Request for Extension of Word Limit

Hon. Judge Brasel:

In accordance with Local Rule 7.1(f)(1)(D), the parties jointly request that the word limit for summary judgment motions be extended by 7,000 words for each moving party. All dispositive motions are currently due on September 3, 2024, and the parties anticipate filing cross motions for summary judgment. Under Local Rule 7.1(f)(1)(A), the word limit for dispositive motions is 12,000 words. Local Rule 7.1(f)(1)(B) requires the moving party to split those 12,000 words between their initial supporting memorandum and a reply memorandum.

The requested extension is necessary to allow the parties to adequately brief the numerous issues presented by this case. Between Plaintiffs' nine claims and the Minnesota Department of Education's six counterclaims, there are fifteen unique claims to be addressed. The 12,000 words allotted by the Rules is insufficient for either moving party to properly lay out the factual and procedural background of the case, provide complete arguments regarding each of the outstanding issues in the case, and then reply to any novel arguments raised in the response briefing. The requested extension would therefore aid the Court in resolving the various claims and counterclaims by allowing the parties to fully brief the complex legal issues in this case.

The parties therefore jointly request that each moving party be granted an additional 7,000 words, for a total of 19,000 words, to split between their opening and reply briefs.



Respectfully submitted,

/s/ Eric S. Baxter

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